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20 TONY LOPRESTI, County Counsel (S.B. #289269)  
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26 Attorneys for Defendant  
27 COUNTY OF SANTA CLARA

28 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

29 JANE DOE, individually and on behalf of others  
similarly situated,

30 Plaintiff,  
31  
32 v.

33 THE COUNTY OF SANTA CLARA d/b/a  
34 SANTA CLARA VALLEY MEDICAL  
35 CENTER,

36 Defendant.

37 No. 23-CV-04411 WHO

38 **JOINT STIPULATION FOR EXTENSION**  
**OF TIME FOR FILING RESPONSE AND**  
**REPLY BRIEFS REGARDING**  
**DEFENDANT COUNTY OF SANTA**  
**CLARA'S MOTION TO DISMISS**

39 Date: Oct. 30, 2024  
40 Time: 2:00 pm  
41 Crtrm: 2, 17th Floor  
42 Judge: The Hon. William H. Orrick

1 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiff Jane Doe (“Plaintiff”) and  
2 Defendant County of Santa Clara (“Defendant”), by and through their respective counsel of record,  
3 hereby stipulate as follows.

4 WHEREAS Defendant filed a Motion to Dismiss (ECF No. 69) and Request for Judicial  
5 Notice (ECF No. 70) on August 30, 2024;

6 WHEREAS Plaintiff’s Response to Defendant’s Motion to Dismiss and Request for Judicial  
7 Notice is currently due on September 13, 2024;

8 WHEREAS Defendant’s Reply in Support of its Motion to Dismiss and Request for Judicial  
9 Notice is currently due seven days after the Response;

10 WHEREAS because of counsel’s other work obligations, vacation, and other scheduling  
11 conflicts, counsel have agreed to a one-week extension of both the Response and Reply deadlines;

12 WHEREAS the proposed extensions will not alter the hearing scheduled on the Motion to  
13 Dismiss and Request for Judicial Notice for October 30, 2024;

14 NOW, THEREFORE, the parties agree and jointly request that the Court order as follows:

15 1. Plaintiff shall Respond to Defendant’s Motion to Dismiss and Request for Judicial  
16 Notice no later than September 20, 2024;

17 2. Defendant shall file any Reply in Support of its Motion to Dismiss and Request for  
18 Judicial Notice no later than October 4, 2024; and

19 3. The Hearing on Defendant’s Motion to Dismiss and Request for Judicial Notice shall  
20 remain scheduled for October 30, 2024.

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22 Dated: September 6, 2024

Respectfully submitted,

23

By: /s/ Michael A. Caddell

24 MICHAEL A. CADDELL  
CYNTHIA B. CHAPMAN  
AMY E. TABOR  
CADDELL & CHAPMAN

25

26 Attorneys for Plaintiff JANE DOE

27

28

1 Dated: September 6, 2024

By: /s/ Xavier M. Brandwajn

2 TONY LOPRESTI  
3 COUNTY COUNSEL  
4 XAVIER M. BRANDWAJN  
5 JOSÉ L. MARTIN  
6 Deputy County Counsel

7 Attorneys for Defendant  
8 COUNTY OF SANTA CLARA

9 **CERTIFICATION**

10 Pursuant to Civil Local Rule 5-1(i)(3), I attest that the concurrence of Xavier Brandwajn in  
11 the filing of this stipulation has been obtained.

12 /s/Amy E. Tabor

13 Amy E. Tabor

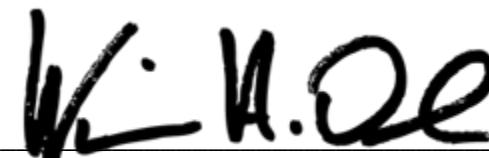
14 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED** that:

15 1. Plaintiff shall Respond to Defendant's Motion to Dismiss and Request for Judicial  
16 Notice no later than September 20, 2024.

17 2. Defendant shall file any Reply in Support of its Motion to Dismiss and Request for  
18 Judicial Notice no later than October 4, 2024.

19 3. The Hearing currently scheduled for October 30, 2024 remains scheduled at 2:00 p.m.

20 Dated: September 6, 2024

21   
22 THE HONORABLE WILLIAM H. ORRICK  
23 Senior U.S. District Court Judge

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